

## May MBR Talking Points

**Metric Name:** EPA Permit Backlog- New UIC

**Metric Direction:** Decreasing

**Monthly Target:** 0    **Monthly Result:** 2

**Metric Definition:** Sum of the applications for new EPA UIC permits (all Classes) that have been pending for over 6 months. This measure only includes those wells that do not already have an EPA UIC permit (for the new well class).

### 1. Bull Run

- 180 day deadline: April 6, 2021

**Permit issuance has been delayed because:**

- The permit application was delayed due to the tribal consultative process.
- The program did not public notice the permit until they heard back from the tribe, thus delaying the process but ensuring that the tribe feels that they are a priority and we are not rushing the consultative process. The tribe declined to consult on this permit.

**Resolution:** The permit was signed on May 12, 2021 so this permit is no longer in backlog.

### 2. Roulette

- 180 day deadline: March 17, 2021

**Permit issuance was delayed because:**

- As a result of COVID, local government claimed that additional time was necessary to provide them and the public an opportunity to review. To ensure transparency and adequate public and local government review, EPA agreed to extend the comment period from 30 days to 90 days.
- Additionally, the Seneca Nation requested consultation. The program met with the Seneca Nation and are in receipt of their formal comments.
- The program received 70 comments in total.
  - Staff are working on finalizing our comments to the Seneca Nation. ORC is actively engaged in assisting with the review.
  - HQ provided contractual support (Cadmus) to assist with organizing and responding to the 40 public comments received during the public hearing.
- **Resolution:** We are actively working on finalizing the responses to the tribe and public. Once finalized, these comments will be routed through to the Division Director for review and approval.
  - **Deadline:** We hope to have formal comments to Seneca Nation in concurrence by mid-June.
  - **Deadline:** We hope to have formal comments to the public in concurrence by August.